

FILED

NOV - 1 2017

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER REED HAGER,

Defendant.

No.

4:17CR00499 AGF/JMB

INDICTMENT

COUNT I

The Grand Jury alleges that:

Between on or about July 1, 2014 and continuing through February 1, 2017 (the “relevant time period”) in St. Louis County within the Eastern District of Missouri and elsewhere,

CHRISTOPHER REED HAGER,

the Defendant herein did knowingly and intentionally devise a scheme to defraud and to obtain money from his employer by means of false and fraudulent representations, promises and pretenses and, in furtherance and execution thereof, did send and cause to be sent electronic and wire signs, signals and communications in interstate commerce.

Specifically during the relevant time period, the Defendant, while working as the IT director of a web-based business (“employer”) with offices in St. Louis County and elsewhere, set up an account with an advertising company doing business with employer. Defendant further wrote false and fraudulent computer code for employer’s site which directed more than \$40,000 in

revenue rightly due employer to his bank account. In furtherance and execution of the scheme, Defendant sent and caused to be sent electronic wire communications between the States of Missouri, Indiana and Texas, to wit: messages directing funds due Defendant's employer to Defendant's financial account and other communications relating to the scheme.

In violation of Title 18, United States Code Section 1343.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of the violation alleged in Count 1, the defendant shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to

Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

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Assistant United States Attorney